



Recommendation No. 151

April 23, 2002

General Separations Area Consolidation Unit

Background

In the preamble to the National Contingency Plan (NCP), the concept of "area of contamination" was introduced. Under the NCP, certain areas of generally dispersed contamination (called "areas of contamination") can be considered as a single disposal unit for remedial purposes. The area of contamination concept is particularly useful for consolidation of contiguous units or areas of contaminated soil (Ref. 1).

The Savannah River Site (SRS), with concurrence from SCDHEC, is incorporating this approach for several inactive operable units in the General Separations Area (Ref. 2). Basically, four discrete units will be combined into one remedial design. The four units consist of the Old Radioactive Waste Burial Ground (ORWBG), Warner's Pond, H-Area Retention Basin, and HP-52 Ponds. The scope of the remedial action includes:

1. Closure of the 22 ORWBG old solvent tanks under an interim action.
2. Removal of highly contaminated soils/material from Warner's Pond, H-Area Retention Basin, and HP-52 Ponds and consolidation at pre-determined locations within the ORWBG.
3. Backfill and cover of excavated areas in Warner's Pond, H-Area Retention Basin, and HP-52 Ponds.
4. Installation of an engineered cover system over the entire ORWBG, including the 22 old solvent tanks.
5. Activation of institutional controls and installation of intruder barriers over persistent "hot spots" after the loss of institutional controls.

This approach closes the highest risk operable units in the Environmental Restoration program and uses an interim action to close the 22 old solvent tanks. It accelerates the remediation of several units under one single action, thereby avoiding \$150 million in remediation costs and saving \$3.6 million by streamlining the regulatory decision-making process. The public review period for the Proposed Plan is anticipated to begin this June or early July (2002).

Comment

As early as 1997, the SRS Citizens Advisory Board (CAB) voiced its support of actions that shorten the time and costs for waste unit investigation and remediation (Ref. 3). Then in 1998 and 1999, the SRS CAB was fully behind the use of the Plug-in RODs as a method to reduce the costs of cleanup, the regulatory paperwork, and the time involved in achieving actual site remediation (Ref. 4). Furthermore, in 2000, the SRS CAB stated its belief that "it may be more cost effective to remediate commingled contamination from several OU(s) instead of individual separate discrete actions" (Ref. 5). The SRS CAB likes the precedent it has established and fully supports the consolidation unit approach being used in the General Separations Area as another method to reduce the costs of cleanup, the regulatory paperwork, and the time involved in achieving actual site remediation. In addition, the use of the Interim Action to close the 22 old solvent tanks appears to be a prudent way to get the job done ahead of schedule. Therefore, the SRS CAB will be in favor of and support the approach when the official public comment period begins this summer.

Recommendation

The SRS CAB would like to see more action taken to expedite remediation and lower environmental risks, especially if they can be performed in a streamlined fashion and at cost savings. Therefore, the SRS CAB offers the following recommendations before the public notice period:

1. SRS utilize the Cleanup Reform Appropriations (CRA) to request additional funds to accelerate the ultimate closure of the General Separations Areas Consolidation Unit.

2. SRS provide the SRS CAB a briefing on the Proposed Plan including milestones and cost estimates by June 18, 2002.
3. SRS provide a list to the SRS CAB of by January 23, 2003 or earlier, any and all additional areas where the consolidation units cleanup approach can be utilized in an accelerated manner.

References

1. National Contingency Plan, Federal Register Volume 55, pp.8758-8760, March 8, 1990.
2. Use of the Old Radioactive Waste Burial Ground as a Consolidation Unit, presentation to the ER Committee by Ed McNamee, March 26, 2002.
3. Citizens Advisory Board Recommendation No. 50 (adopted November 18, 1997), "Early Action Strategy".
4. Citizens Advisory Board Recommendation No. 76 (adopted January 26, 1999), "Plug In Records of Decision".
5. Citizens Advisory Board Recommendation No. 114 (adopted January 25, 2000), "Proposed Interim Action Plan for A-Area Burning/Rubble Pit".

Agency Responses

Department of Energy-SR